**REMARKS**

In the Office Action[1], the Examiner took the following actions:

> rejected claims 1, 2, 4-10, 12, 13, and 16 under 35 U.S.C.
> § 103(a) as being unpatentable over U.S. Patent 6,643,825
> to Li et al. ("*Li*") in view of U.S. Patent No. 5,884,309 to
> Vanechanos ("*Vanechanos*");

> rejected claim 11 under 35 U.S.C. § 103(a) as being
> unpatentable over *Li* in view of *Vanechanos* and U.S. Patent
> 6,470,381 to De Boor et al. ("*De Boor*");

> rejected claim 14 under 35 U.S.C. § 103(a) as being
> unpatentable over *Li* in view of *Vanechanos* and U.S. Patent
> 6,247,066 to Tanaka et al. ("*Tanaka*");

> rejected claim 15 under 35 U.S.C. § 103(a) as being
> unpatentable over *Li* in view of *Vanechanos* and U.S. Patent
> 5,754,840 to Rivette et al. ("*Rivette*"); and

> rejected claim 17 without providing any specific grounds.

Applicants amend claims 1, 2, 7, and 13-16 and add independent claim 18.

Claims 1, 2, and 4-18 are pending in the application.

**I. Rejection of claims 1, 2, 4-10, 12, 13, and 16 under 35 U.S.C. § 103(a)**

Applicants respectfully traverses the rejection of claims 1, 2, 4-10, 12, 13, and 16

under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos*. A

*prima facie* case of obviousness has not been established.

"The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation

of the reason(s) why the claimed invention would have been obvious." M.P.E.P.

§ 2142(III). "[T]he framework for objective analysis for determining obviousness under

35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459

(1966). . . . The factual inquiries . . . are as follows:

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

(A) [Determining the scope and content of the prior art;]

(B) Ascertaining the differences between the claimed invention and the prior art; and

(C) Resolving the level of ordinary skill in the pertinent art."

M.P.E.P. § 2141(II). "Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art." M.P.E.P. § 2141(III).

Here, *prima facie* case of obviousness has not been established at least because the scope and content of the prior art have not been properly determined, and the differences between the prior art and the subject matter of Applicants' claims, as amended, have not been properly ascertained.

For example, amended claim 1 recites a combination comprising, among other things, "convert[ing] **data from the user terminal into a format compatible with the key task processing database** if it is determined that the display format is not dependent on the operating system." (Emphasis added).

*Li* discloses a system that allows a user to reformat a host screen based on a selection made by the user in a graphical user interface. Col. 5, lines 55-60. The system of *Li* can use the selection to generate different styles and layouts from the same XML stream. Col. 5, lines 19-32. The styles include a "web style" and a "Plain" layout that "show[s] all fields in the traditional terminal window format." Col. 6, lines 28-29 and 62-67. Thus, *Li* merely discloses a system to display data using different layouts. Accordingly, neither these portions of *Li*, nor any other portion of *Li*, constitutes a teaching or suggestion of "convert[ing] data from the user terminal into a format

compatible with the key task processing database if it is determined that the display format is not dependent on the operating system."

*Vanechanos* fails to remedy the deficiencies of *Li*. *Vanechanos* discloses that data may need to be reformatted to transfer the data from one database management to another. Col. 3, lines 6-8. For example, if a retailer wants to implement a system on the web, the retailer may have to convert his databases into a format compatible with the web server. Col. 3, lines 12-16. The system of *Vanechanos*, however, operates on ASCII files to run its searches, as most databases can output their content in ASCII format. Col. 4, lines 16-35.

In other words, *Vanechanos* discloses converting databases from one format to another or, in the alternative, searching data in a format that most databases can output. Accordingly, neither these portions of *Vanechanos*, nor any other portion of *Vanechanos*, constitutes a teaching or suggestion of "convert[ing] data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system."

For at least the foregoing reasons, the scope and content of prior art have not been properly ascertained, nor have the differences between the prior art and applicants claims been properly determined. Moreover, no motivation has been established as to why one of ordinary skill in the art would modify the prior art to achieve the claimed combination. Accordingly, a *prima facie* case of obviousness has not been established.

Independent claims 2 and 7, while of different scope, recite elements similar to those of claim 1 and are thus allowable over *Li* for at least the same reasons discussed above in regard to claim 1. New independent claim 18 is also allowable for at least the

same reasons. Furthermore, claims 4-6 are allowable at least due to their dependence from claim 1 or 2. Claims 8-10, 12, 13, and 16 are also allowable at least due to the dependence from claim 7.

## II. Rejection of claim 11 under 35 U.S.C. § 103(a)

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 11 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *De Boor*. A *prima facie* case of obviousness has not been established with respect to this claim.

Claim 11 depends indirectly on claim 7 and thus requires each and every element of claim 7. As set forth above, *Li* and *Vanechanos* fail to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 11. The Examiner asserts that *De Boor* teaches function keys that have variable functionality that change depending on the particular screen display of the user interface being shown. Even assuming the Examiner is correct, which Applicants do not concede, *De Boor* fails to cure the deficiencies of *Li* and *Vanechanos*. That is, *De Boor* also fails to teach or suggest "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 11.

In view of above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the invention of claim 11. Thus, no reason has been clearly articulated as to

why claim 11 would have been obvious to one of ordinary skill in the art in view of the prior art. Accordingly, a *prima facie* case of obviousness has not been established. Applicants therefore respectfully request that the Examiner withdraw the rejection of claim 11 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *De Boor*.

### III. Rejection of claims 14 under 35 U.S.C. § 103(a)

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 14 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *Tanaka*. A *prima facie* case of obviousness has not been established with respect to this claim.

Claim 14 depends from claim 7 and thus requires each and every element of claim 7. As set forth above, *Li* and *Vanechanoes* fail to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 14. The Examiner asserts that *Tanaka* teaches a compound document processing system that adds a new row to the command argument and inserts the name and meaning of the argument into the added row. Even assuming the Examiner is correct, which Applicants do not concede, *Tanaka* fails to cure the deficiencies of *Li* and *Vanechanoes*. That is, *Tanaka* also fails to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 14.

In view of above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the invention of claim 14. Thus, no reason has been clearly articulated as to why claim 14 would have been obvious to one of ordinary skill in the art in view of the prior art. Accordingly, a *prima facie* case of obviousness has not been established. Applicants therefore respectfully request that the Examiner withdraw the rejection of claim 14 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *Tanaka*.

### IV. Rejection of claims 15 under 35 U.S.C. § 103(a)

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 15 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *Rivette*. A *prima facie* case of obviousness has not been established with respect to this claim.

Claim 15 depends from claim 7 and thus requires each and every element of claim 7. As set forth above, *Li* and *Vanechanos* fail to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 15. The Examiner asserts that *Rivette* teaches an edit drop down menu on a menu bar, adding a command button or menu command to a menu command button in the word processing window, and performing the action. Even assuming the Examiner is correct, which Applicants do not concede, *Rivette* fails to cure the deficiencies of *Li* and *Vanechamos*. That is, *Rivette* also fails to teach or suggest at least "means for converting data from

the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 15.

In view of above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the invention of claim 15. Thus, no reason has been clearly articulated as to why claim 15 would have been obvious to one of ordinary skill in the art in view of the prior art. Accordingly, a *prima facie* case of obviousness has not been established. Applicants therefore respectfully request that the Examiner withdraw the rejection of claim 15 under 35 U.S.C. § 103(a) as being unpatentable over *Li* in view of *Vanechanos* and *Rivette*.


## V. Rejection of claim 17

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 17. Claim 17 is dependent upon claim 11 and Applicants assume that claim 17 is rejected under the same grounds. A *prima facie* case of obviousness has not been established with respect to this claim.

The basis for this rejection is not made clear in the Office Action. The discussion of the rejection cites only to *Li*. (Office Action at pp. 14). Claim 17 depends indirectly on claim 7 and thus requires each and every element of claim 7. As set forth above, *Li* and *Vanechanos* fail to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited in claim 7 and required by claim 17.

Although the rejection of claim 17 discusses only *Li*, the discussion of claim 11, from which claim 17 depends, cites to *De Boor*. However, neither *De Boor* nor any other cited reference cures the deficiencies of *Li* and *Vanechanos*. That is, the remaining references also fail to teach or suggest at least "means for converting data from the user terminal into a format compatible with the key task processing database if it is determined that the display format is not dependent on the operating system," as recited by claim 11 and required by claim 17. Accordingly, the cited prior art cannot render obvious the invention recited in claim 17 .

In view of above, the Office Action has neither properly determined the scope and content of the prior art nor properly ascertained the differences between the prior art and the invention of claim 17. Thus, no reason has been clearly articulated as to why claim 17 would have been obvious to one of ordinary skill in the art in view of the prior art. Accordingly, a *prima facie* case of obviousness has not been established. Applicants therefore respectfully request that the Examiner withdraw the rejection of claim 17 under 35 U.S.C. § 103(a).

In view of the foregoing remarks, Applicants submit that this claimed invention is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge

any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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